

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BRIAN L. FRECHETTE,

Plaintiff,

v.

AMERIQUEST MORTGAGE COMPANY
and DEUTSCHE BANK NATIONAL
TRUST COMPANY, as TRUSTEE of
AMERIQUEST MORTGAGE
SECURITIES, INC., ASSET BACKED
PASS-THROUGH CERTIFICATES,
SERIES 2003-11 UNDER THE POOLING
AND SERVICING AGREEMENT DATED
AS OF NOVEMBER 1, 2003, WITHOUT
RECOURSE

Defendants.

CIVIL ACTION NO. 05-11398-RWZ

DECLARATION OF SHANE STAGNER

I, Shange Stagner, hereby declare under oath as follows:

1. I am employed by Defendant Amerquest Mortgage Company ("Amerquest") as a Manager of Customer Resolution, in Amerquest's offices located at 1600 Douglass Road, Floor 2, Anaheim, CA 92806.

2. I make this declaration in connection with, and in support of Amerquest Mortgage Company's ("Amerquest") and Deutsche Bank National Trust Company, as Trustee of Amerquest Mortgage Securities, Inc. Asset Backed Pass-Through Certificates, Series 2003-11 Under the Pooling and Servicing Agreement Dated as of November 1, 2003, Without Recourse's ("Deutsche Bank, as Trustee") Motion for Entry of a Confidentiality Order and Incorporated Memorandum of Law.

3. I am competent to testify to the facts set forth below based on my personal

knowledge or my review of Ameriquest's business records.

4. Ameriquest has requested that, in advance of any production, plaintiff Brian Frechette ("Frechette") agree not to disseminate this confidential and proprietary information to the public or to any third party.

5. Ameriquest closely protects its confidential and proprietary information since it is this information that provides Ameriquest with a significant competitive advantage in the mortgage industry.

6. Such confidential and proprietary information includes, but is not limited to, Ameriquest's internal policies, criteria and underwriting standards Ameriquest uses in determining its loan terms; the process through which Ameriquest determines such matters as minimum qualification for applicants; the procedures for providing disclosures under applicable federal, state or local law in its loan application process; the manner in which it originates, processes, approves and underwrites its loans; its dealings with vendors, titling companies, appraisal companies and insurance companies; its employee training; and the method and practice by which Ameriquest calculates its interest rates, fees and discount points.

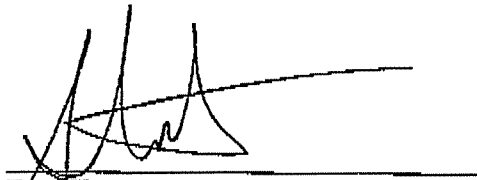
7. Ameriquest has expended and continues to expend significant resources to create and maintain its policies, practices, employee training and computer software programs, and this information is not publicly disseminated.

8. The disclosure of such financial, proprietary, technical or other internal confidential and sensitive business information by Ameriquest can reasonably be anticipated to cause competitive injury to Ameriquest or cause injury to the current or future business relations of Ameriquest should this information be disclosed by Frechette to third parties or by its entry into the public record.

9. Ameriquest would be severely prejudiced should Frechette be permitted to disseminate such information to the public, and its competitive advantage in the mortgage industry would be seriously jeopardized.

10. The handling of and access to such documents, testimony, and other confidential and proprietary information must therefore be carefully monitored and protected against unrestricted disclosure and use of that information by the parties hereto or by third parties.

I HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. EXECUTED THIS 10 TH DAY OF FEBRUARY, 2006 AT ANAHEIM, CALIFORNIA.

A handwritten signature in black ink, appearing to read 'Shange Stagner', is written over a horizontal line.

By: Shange Stagner
Title: Manager of Customer Resolution

CERTIFICATE OF SERVICE

I hereby certify that this document, filed on February 10, 2006 through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 10, 2006.

/s/ Phoebe S. Winder

Phoebe S. Winder